

REMARKS

Claims 1, 2, 4-9, 11-13, 15-20 and 22-26 are pending in the present application. Reconsideration of the claims is respectfully requested.

I. 35 U.S.C. § 103, Obviousness, Claims 1-2, 4, 12-15 and 23-24

The Office Action has rejected claims 1-2, 4, 12-15 and 23-24 under 35 U.S.C. § 103 as being unpatentable over *Guedalia* (U.S. Patent No. 6,121,970) in view of *Angiulo et al.* (U.S. Patent No. 6,275,829). This rejection is respectfully traversed.

As to claims 1, the Office Action states:

As to independent claim 1:

- a. Guedalia teaches method for magnifying a portion of a document in a browser (*Abstract*), comprising:
 - (i) presenting a first document in a first display in the browser on a client (e.g., *receiving by the client computer from the server an HTML page; Abstract/col. 4, lines 29-41/col. 5, lines 52-53/col. 8, lines 51-52*);
 - (ii) generating a magnified display of the first document in memory at the client (e.g., *the second image being an enlarged portion of the first image, and the enlarged portion of the first image corresponding to the selected location; Abstract / col. 13, lines 60-67 and col. 17, lines 56-61*);
 - (iii) displaying in a second display in the browser a selected portion of the magnified display corresponding to a selected portion of the first document (e.g., *a second HTML page, generated by the server, in response to the sub-region which was selected; col. 18, lines 45-51*);
 - (iv) response to receiving a request for an action within the second display; and performing the action with respect to the first document (e.g., *items 86-92 in Fig. 4*).
- b. Guedalia teach image map, but does not explicitly teach "mapping the selected portion of the magnified display to a display space of the selected portion of the first document."
- c. Angiulo teaches mapping the selected portion of the magnified display to a display space of the selected portion of the first document (*col. 4, lines 18-30*).
- d. It would have been obvious to one of ordinary skill in the art at the time of the invention was made to include the feature from Hsing in the system of Guedalia because it would have allowed for

efficient caching on both the client and server sides, so as to reduce network latency for client and also boost server performance.

Office Action dated February 24, 2005, pages 3-4.

Claim 1, which is representative of the other rejected independent claims 8, 12, 19, 23 and 25 with respect to similarly recited subject matter, reads as follows:

1. A method for magnifying a portion of a document in a browser on a client, comprising:
 - presenting a first document in a first display in the browser on a client;
 - generating a magnified display of the first document in memory at the client;
 - displaying in a second display in the browser a selected portion of the magnified display corresponding to a selected portion of the first document;
 - mapping the selected portion of the magnified display to a display space of the selected portion of the first document; and
 - responsive to receiving a request for an action within the second display, performing the action with respect to the first document.

Guedalia and *Angiulo et al.*, taken alone or in combination, fail to teach or suggest magnifying a portion of a document in a browser. *Guedalia* is directed to client/server architecture for interactive viewing of image data. *See Guedalia* Abstract and col. 11, lines 31-36. Specifically, it is concerned with viewing large images, where the user can only view a portion of the image at any given instant but may view the image interactively using pan and zoom. *See Guedalia* column 11, lines 32-45. *Guedalia* teaches receiving by the client computer from the server an HTML page, including a view window within which a first image is displayed, the view window being partitioned into a plurality of imaginary sub-regions. The user selects, using a pointing device, a location within the view window corresponding to one of the plurality of sub-regions, sending by the client computer to the server computer an indication of the sub-region selected by the user. The server modifies the HTML page to generate a new HTML page with a link to a second image, the second image being an enlarged portion of the first image corresponding to the selected location, and sending by the server computer to the client computer the new HTML page. *See Guedalia* Abstract.

The system of *Guedalia* merely teaches interactive viewing of HTML pages received by the client from a server. Although *Guedalia* provides that the new HTML

page sent to the client by the server may be an enlarged portion of the first image, for example in a zoom rather than a pan view, *Guedalia* does not teach "generating a magnified display of the first document in memory at the client."

The Office Action also alleges that *Guedalia* teaches this feature at Abstract (quoted above); column 13, lines 60-67; and column 17, lines 56-61 which reads as follows:

FIG. 2 illustrates an example of zooming in. The user positions a mouse pointer at a position within the view window, and clicks on the mouse. This issues a request to zoom in on the portion of the image where the mouse pointer is located. In a preferred embodiment, the present invention operates by identifying a specific image portion, associated with the sub-region containing the mouse pointer, to be magnified.

Guedalia column 13, lines 60-67.

Modifying, by said server computer using server-side software, the HTML page to generate anew HTML page with a link to a second image, the second image being an enlarged portion of the first image, and the enlarged portion of the first image corresponding to the selected location; and
Sending by said server computer to said client computer said new HTML page.

Guedalia column 17, lines 56-61.

Guedalia merely teaches use of a mouse pointer to indicate a particular sub-region corresponding to a new HTML page that will be sent by the server to the client computer for viewing. Each sub-region is used to trigger the server to embed an appropriate image portion in the server's response. As shown above, the system of *Guedalia* is limited to displaying a zoomed or enlarged image received by the client from the server. *See also Guedalia* Abstract; column 4, lines 25-41; column 5, lines 50-60 and column 8, lines 45-60. Thus, *Guedalia* merely retrieves a pre-existing image rather than "generating a magnified display of the first document in memory at the client," as recited in claim 1.

Unlike the presently claimed invention, the system of *Guedalia* relies on a server to send a new HTML page or image, which may be a magnified display, to the client computer for viewing in response to user identifying/selecting a specific sub-region of the client view window. *See Guedalia* column 8, lines 50-55 and column 13, lines 60-67. In

contradistinction, the presently claimed invention performs the entire magnification process at the client by “generating a magnified display of the first document in memory at the client,” as recited in claim 1.

Guedalia also does not teach “displaying in a second display in the browser a selected portion of the magnified display corresponding to a selected portion of the first document” as alleged in the Office Action. The Office Action alleges this feature is taught at vol. 18, lines 45-51, which states as follows:

Receiving by said client computer a second HTML page, generated by said server computer, in response to said sub-region which was selected, wherein said second HTML page contains a link to a second image, the second image being an enlarged portion of the first image, and the enlarged portion of the first image corresponding to the selected location; and

Guedalia column 18, lines 56-61. The above cited portion of *Guedalia* teaches a server computer generating a new HTML page and sending it to the client computer in response to user selecting a sub-region in the view window. *Guedalia* relies on a server to create or generate the enlarged image and send it to the client for display. As shown above, *Guedalia* is limited to displaying a new HTML page sent by a server, rather than magnifying the content of an entire document in memory at the client and displaying a portion of the magnified display corresponding to a selected portion of the document. In contradistinction, the present invention operates by magnifying the content of an entire document in memory at the client and “displaying in a second display in the browser a selected portion of the magnified display corresponding to a selected portion of the first document,” as recited in claim 1.

Furthermore, *Guedalia* does not teach “responsive to receiving a request for an action within the second display, performing the action with respect to the first document.” The Office Action alleges that *Guedalia* teaches this feature at items 86-92 in Fig. 4. The items in figure 4 merely illustrate the steps involved in “going from one displayed HTML page to another in response to an interactive user request.” *Guedalia* col. 15, line 65-col. 16, line 2. Here, *Guedalia* teaches that a server sends an HTML page with an imbedded image portion to the client. Client clicks on a location within the view window sending mouse pointer coordinates to the server. The server identifies the image

portion to be used in response and creates a new HTML page with a link to indicate the response image portion. In items 86-92, the client receives the new HTML page with the link to the imbedded image portion. The client then checks whether the embedded image portion is in local cache. Thus, *Guedalia* merely describes receiving a magnified portion from the server in response to user's selection of a sub-region within the view window and does not describe any actions after presentation of the magnified portion. As shown above, *Guedalia* does not teach "responsive to receiving a request for an action within the second display, performing the action with respect to the first document," as recited in claim 1.

The examiner acknowledges that *Guedalia* fails to teach or suggest "mapping the selected portion of the magnified display to a display space of the selected portion of the first document." The Office Action alleges, however, that *Angiulo* teaches this feature at column 4, lines 18-30, which read as follows:

A web server program typically maps document object names that are known to the client to file names on the server file system. This mapping may be arbitrarily complex, and any author or program that tries to access documents on the web server directly would need to understand this name mapping. A user (typically using a computer other than that used to execute the web server program) who wishes to access document available on the network at a Web site runs a web browser. The combination of the web server and web browser program allows the user to retrieve and display documents from web servers. Some of the popular web

Angiulo, column 4, lines 18-30.

As shown above, *Angiulo* merely teaches using a web browser to access documents available to network users. The mapping described in *Angiulo* is merely mapping document object names known to the client to file names on the server. It does not in any way teach or suggest "mapping a selected portion of a magnified display to a display space of the selected portion of a first document," as recited in claim 1. In fact, nowhere in any section of *Guedalia* or *Angiulo* is "mapping a selected portion of a magnified display to a display space of the selected portion of the first document" taught or suggested. Teaching mapping of document object names to file names on a server does not make up for the deficiencies of *Guedalia*.

The system of *Guedalia* seeks to solve the problem of non-smooth interactive image navigation that can occur due to delays or latency in data access via the Internet due to the large amounts of data to download in interactive image navigation. See *Guedalia* column 12, lines 1-14 and column 2, lines 40-60. In interactive viewing of images, only selected portions of a large image are sent to the client computer limiting the user to viewing only a portion of an image, but may navigate in all four directions and zoom to inspect details of the full image. See *Guedalia* col. 2, lines 40-60 and Abstract. Each time a user pans or zooms, the server must send a new image to the client computer, which can result in the non-smooth navigation experience, which *Guedalia* seeks to solve. See *Guedalia* column 12, lines 1-14 and column 2, lines 40-60. Thus, *Guedalia* is directed only to improving efficiency of downloading images on the Internet for interactive viewing by a user.

Unlike *Guedalia*, the presently claimed invention is directed to solving the problems encountered by visually impaired users that find it difficult to locate links in documents with small print or icons. Other problems are encountered by users that have difficulty with fine motor movements and may not be able to manipulate a mouse pointer with accuracy, thus making it difficult to select links. The present invention solves this problem by magnifying a portion of a document in a browser on a client while retaining browser functionality within the magnified display.

There is not so much as a suggestion in *Guedalia* and *Angiulo* to modify the references to include the combination of features presently claimed. Moreover, there is no suggestion in the references that a problem exists for which magnifying a portion of a document in a browser on the client is a solution. To the contrary, *Guedalia* teaches away from the present invention in that *Guedalia* teaches partitioning the view window, in which the client is displaying changing images as the user navigates and requires the user to select a sub-region to request that the server send a new HTML page to the client. See *Guedalia* column 3, line 66-column 4, line 16.

None of the cited references teach, suggest or motivate "generating a magnified display of the first document in memory at the client; displaying in a second display in the browser at the client a selected portion of the magnified display corresponding to a selected portion of the first document; mapping the selected portion of the magnified

display to a display space of the selected portion of the first document; and responsive to receiving a request for an action within the second display, performing the action with respect to the first document” as recited in claim 1. Therefore, *Guedalia* and *Angiulo*, taken either alone or in combination, fail to teach or suggest all of the features in independent claim 1.

Independent claims 8, 12, 19, 23 and 25 recite subject matter addressed above with respect to claim 1 and are allowable for similar reasons. Because claims 2-7, 9-11, 13-18, 20-22, 24, and 26 depend from claims 1, 8, 12, 19, 23, and 25, the same distinctions between the presently claimed invention and the cited references apply for these claims. Additionally, claims 2-7, 9-11, 13-18, 20-22, 24, and 26 recite additional features and combinations not taught or suggested by applied references.

Specifically, with respect to claim 2, the Office Action alleges that *Guedalia* teaches selection of a link within the magnified portion and the step of performing the action comprises retrieving and displaying a second document corresponding to the link in the first display at *Guedalia* column 4, lines 18-30, which reads as follows:

to the same image over and over. Thus by caching these images within the client, the client provides an instant interactive response whenever the user navigates back to the same image. Moreover, by caching these images within the server, redundant processing for multiple clients can be eliminated, enabling the server to respond quickly to many clients simultaneously.

There is thus provided in accordance with a preferred embodiment of the present invention a method for archiving digital data on a server computer, and enabling a user, by means of a client computer, to interactively view a digital image derived from the digital data, including receiving by the client computer from the server computer an HTML

Guedalia column 4, lines 18-30.

As shown above, *Guedalia* merely teaches caching images at the client and server to avoid latency or delay in downloading images from the Internet. *See also* column 12, lines 1-14. As discussed above, *Guedalia* does not describe any actions after presentation of the magnified portion. Nowhere in the cited reference is “selection of a link within the magnified portion and the step of performing the action comprises retrieving and displaying a second document corresponding to the link in the first display,” as recited in

claim 2. Claim 2 accordingly should be allowable in its own right as well as by virtue of its dependency from claim 1.

Dependent claims 9, 13, 15, 20, 24 and 26 recite subject matter similar to that of claim 2. Claims 9, 13, 15, 20, 24 and 26, accordingly, are also allowable in their own right as well as by virtue of their dependency under the same rationale as discussed above.

As to dependent claim 4, the Office Action states that *Guedalia* teaches mapping the magnified portion of the first document to form an imagemap at Abstract and col. 3, lines 33-35. The Abstract is quoted above. *Guedalia* at column 3, lines 33-35 reads as follows:

has a feature called image maps, which enables the browser to send back to the server the coordinates within an image corresponding to the location of the mouse pointer when the

Guedalia column 3, lines 33-35.

Here, *Guedalia* merely teaches that HTML can use image maps to enable the browser to send the coordinates of the location that a user selects within an image back to the server, permitting the server to generate the next HTML page. *Guedalia* does not in any way teach or suggest "mapping the magnified portion to the first document to form an imagemap," as recited in claim 4.

As to dependent claims 13 and 15, they include the same limitations as in claims 2 and 4 and the same distinction between *Guedalia* and *Angiulo* set forth above as to claims 2 and 4, apply for claims 13 and 15.

Neither *Guedalia* nor *Angiulo*, alone or in combination, teaches or suggests the desirability of incorporating the subject matter of the other reference. That is, there is no motivation offered in either reference for the alleged combination. As discussed above, neither reference teaches, suggests or motivates magnifying a portion of a document in a browser on a client while retaining browser functionality.

The Office Action alleges that the motivation for including "the feature from *Hsing* in the system of *Guedalia* because it would have allowed for efficient caching on both the client and server sides, so as to reduce network latency for client and also boost server performance." Applicant assumes the Office Action meant the combination of

Angiulo and *Guedalia* would have been motivated for this reason, rather than *Hsing* and *Guedalia*, because the Office Action does not reference *Hsing* in regard to claim 1. However, neither *Angiulo* nor *Guedalia* teaches or suggests magnifying a portion of a document in a browser at the client while retaining browser functionality. In fact, neither reference even recognizes that a problem exists for which magnifying a portion of a document in a browser on a client might be a solution. Thus, the only teaching or suggestion to even attempt the alleged combination is based on a prior knowledge of Applicant's claimed invention thereby constituting impermissible hindsight reconstruction using Applicant's own disclosure as a guide.

One of ordinary skill in the art, being presented only with *Guedalia* and *Angiulo*, and without having a prior knowledge of Applicant's claimed invention, would not have found it obvious to combine and modify *Guedalia* and *Angiulo* to arrive at Applicant's claimed invention. To the contrary, even if one were somehow motivated to combine *Guedalia* and *Angiulo*, and it were somehow possible to combine the two systems, the result would not be the invention, as recited in claims 1-2, 4, 12-15, and 23-24. The result would simply be a system for interactive viewing of images sent to a client by a server via a web browser utilizing mapping of document object names known to the client to file names on the server. The resulting system would not be capable of magnifying a portion of a document in a browser on a client while maintaining browser functionality.

Thus, *Guedalia* and *Angiulo*, taken alone or in combination, fail to teach or suggest all of the features in independent claims 1, 12 and 23. At least by virtue of their dependency on claims 1, 12 and 23, the features of dependent claims 2, 4, 13-15, and 24 are not taught or suggested by *Guedalia* and *Angiulo*, either alone or in combination. Therefore, the rejection of claims 1-2, 4, 12-15 and 23-24 under 35 U.S.C. § 103 has been overcome. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 1-2, 4, 12-15, and 23-24.

II. 35 U.S.C. § 103, Obviousness, Claims 8-9, 11, 19-22 and 25-26

The Office Action has rejected claims 8-9, 11, 19-22 and 25-26 under 35 U.S.C. § 103 as being unpatentable over Guedalia (U.S. Patent No. 6,121,970) in view of Hsing et al. (U.S. Patent No. 6,826,726). This rejection is respectfully traversed.

As to claims 8, 19 and 25, the Office Action states:

As to independent claim 8:

- a. The rejection of independent claim 1 above is incorporated herein in full. Additionally, claim 8 further recites:
 - (i) receiving a selection of a portion of the first document;
 - (ii) analyzing a document object model for the first document; and
 - (iii) identifying a portion of the document object model that corresponds to the selected portion of the first document.
- c. Guedalia does not explicitly teach "analyzing a document object model for the first document; and identifying a portion of the document model that corresponds to the selected portion of the first document."
- d. Hsing teaches analyzing a document object model for the first document (*col. 3, line 60-col. 4, line 9*); and identifying a portion of the document object model that corresponds to the selected portion of the first document (*col. 4, lines 30-44 and Fig. 8*).
- e. It would have been obvious to one of ordinary skill in the art at the time of the invention was made to include the feature from Hsing in the system of Guedalia because it would have provided the capability for reducing the number of accesses from client to server that will require the transmission of only the smallest amount of data is necessary to provide complete information for the server to update its database.
- f. It is noted that claim 8 does not require the mapping step.

Office Action dated February 24, 2005, pages 5-6.

Independent claim 8 recites subject matter similar to that in independent claim 1. The same distinction between the cited prior art references and claim 1 discussed above apply as to claim 8. The Office Action acknowledges that *Geudalia* does not teach "analyzing a document object model for the first document; and identifying a portion of the document object model that corresponds to the selected portion of the first document," as recited in claim 8. However, the Office Action states that *Hsing* teaches this feature at col. 3, line 60-col.4, line 9 and col. 4, lines 30-44 and Fig. 8. The cited portion of *Hsing* states:

As shown in the flow chart of FIG. 1, changes made to a local database are registered as "events" by Event Listener. In the XML-DOM specification, as applied in the invention, an event occurs whenever a node is added or deleted, or the data in a field is modified. In FIG. 1, events are detected at Event Listener and passed to Change Manager where they are listed as records in Event Table. When modifications to the XML database have been completed, the Change Manager parses Event Table to determine which nodes in the DOM tree are affected by the events listed in the EVENT Table. The parsing creates a second list of changes (the "Save Table") to be transmitted to the computer on which the main database resides which, when applied to the main database, will update that database with the remotely-performed changes, thus keeping the client and server data in synchronization. This second list represents the smallest number of modifications that must be

Hsing column 3, line 60-column 4, line 9.

FIG 2b shows the address book represented as an XML document. In the XML specification, a "document" may constitute almost any object having properties that include a value. The XML structure reflects the organization of the database. Thus, the XML tag <address book>, represents the database, and is located at the highest level. Each database record, defined as a "person," is located at an intermediate level, and has a unique ID attribute that uniquely identifies it and distinguishes it from other elements at the same level. Discrete data elements representing the data in each field of each record are located at the lowest level. In FIG. 2b, the XML tag <person ID="1"> is at the intermediate level, while data maintained under the XML tags for <name>, <phone>, and <email> are located at the lowest level.

Hsing column 4, lines 30-44.

The system of *Hsing* is directed to a method for updating a remote document in accordance with mutations made to a portion of the remote document maintained on a local processing device. The above cited references and Figure 8, merely describe use of document object model (DOM) having a plurality of nodes such that each node corresponds to an XML tag and data element in the XML document. *Hsing* merely teaches that DOM can be updated to conform to mutations to the XML document when a node is added or deleted. A first event table is used to create a second event table that contains the smallest number of events necessary to update the remote document to

conform to the local XML document. Unlike the present invention, *Hsing* does not teach analyzing a DOM for a first document in a browser on the client and identifying a portion of the DOM that corresponds to the selected portion of the first document.

Neither reference teaches or suggests the desirability of incorporating the subject matter of the other reference. There is no motivation offered in either reference for the alleged combination. The Office Action alleges that the motivation for combination is because "it would have provided the capability for reducing the number of accesses from client to server that will require the transmission of only the smallest amount of data is necessary to provide complete information for the server to update its database." As discussed above, *Hsing* is directed to updating a remote document in accordance with mutations made to a portion of the remote documents maintained on the local processing device. Neither reference teaches or suggests the steps of receiving a portion of the first document; analyzing a DOM for the first document; and identifying a portion of the DOM that corresponds to the selected portion of the document.

As to independent claim 19 and 20, they recite subject matter addressed above with respect to claim 8 and are allowable for similar reasons. Because claims 9, 11, 20, 22 and 26 depend from claims 8, 19 and 25, the same distinction between *Hsing* and *Guedalia* apply for these claims.

As to dependent claim 9, it includes the same limitations as in claim 2, and claim 9 is allowable under the same rationale as discussed above regarding claim 2.

As to dependent claim 11, the Office Action alleges that *Guedalia* teaches adjusting attributes of nodes based on a magnification factor at column 16, lines 58-column 17, line 10, which recites as follows:

Specifically, as described above, the browser sends both client state information and mouse coordinates to the server. The tokens received are the view window delimiters $x1o$, $y1o$, $x2o$, $y2o$, the pixel dimensions w , h , and the relative mouse coordinates x , y . The arrays `click_array_x1[]`, `click_array_y1[]`, `click_array_y2[]` specify five sub-regions. For example, the first sub-region is the middle rectangle extending from (0.25, 0.25) to (0.75, 0.75), and the second sub-region is the L-shaped area in the lower left, described by the part of the rectangle extending from (0.0, 0.0) to (0.5, 0.5) which excludes the previous rectangle. The arrays `goto_array_x1[]`, `goto_array_y1[]`, `goto_array_x2[]` and `goto_array_y2[]` specify the image portion to be used for the

response. In the example shown, the first response portion is the image portion in the middle rectangle extending from (.25, 0.25) to (0.75, 0.75) and the second response portion is the image portion in the lower left rectangle extending from (0.0, 0.0) to (0.5, 0.5).

The out.print calls at the end of the listing do the actual writing of the dynamic HTML page.

Hsing column 16, line 58-col. 17, line 10.

As shown above, *Guedalia* is merely describing the process whereby the browser sends client state information and mouse coordinates to the server indicating which image sub-region has been selected by the user. The cited portion of *Guedalia* merely identified the coordinates of the selected sub-region responsive to user request. Nowhere in the cited reference does *Guedalia* teach adjusting the attributes of nodes in the portion of the document object model on a magnification factor.

As to dependent claim 22, it recites the same limitations as in claim 11 and is allowable under the same rationale discussed above in regard to claim 11.

As to independent claim 19, the Office Action states:

Guedalia teaches adjusting attributes of nodes based on a magnification factor (*col. 16, lines 58-col. 17, line 10*).

It is directed to an apparatus for performing the method of claim 8, and is similarly rejected under the same rationale.

Office Action dated February 24, 2005, pages 6-7.

Independent claim 19 recites subject matter addressed above with respect to claim 8 and is allowable for similar reasons. As discussed above, this cited portion of *Guedalia* at col. 16, lines 58-col.17, line 10 does not teach adjusting the attributes of nodes in the portion of the document object model on a magnification factor. However, independent claim 19 does not claim adjusting the attributes of nodes, so this objection is respectfully traversed.

Therefore, the rejection of claims 8-9, 11, 19-22 and 25-26 under 35 U.S.C. § 103 has been overcome.

III. 35 U.S.C. § 103, Obviousness, Claims 5-7 and 16-18

The Office Action has rejected claims 5-7 and 16-18 under 35 U.S.C. § 103 as being unpatentable over Guedalia (U.S. Patent No. 6,121,970) in view of Angiulo et al. (U.S. Patent No. 6,275,829) as applied to claim 1 above and further in view of Aratani (U.S. Patent No. 6,121,970). This rejection is respectfully traversed.

The Office Action alleges as follows:

Line 17), and populating pixels in the second display to form a magnified display (col. 14, line 62-col.15, line 10), but the combination of Guedalia and Angiulo does not explicitly teach "reading pixels from video memory for the magnified portion in a normal display space for the original document."

b. Aratani teaches reading pixels from video memory for the magnified portion in a normal display space for the original document (*e.g., an HTML document formed on the assumption of being seen with a resolution of 1,024*768 is read. The application program performs magnifying processing for all font data; col. 7, lines 41-61*).

Office Action dated February 24, 2005, pages 7-8.

Applicant notes that the first sentence on page 8 is incomplete and the citation to column 14, line 62-column 15, line 10 does not cite a specific reference. Furthermore, the Office Action does not specify which claim this objection is applicable. Therefore, Applicant assumes this objection is directed to dependent claim 5 and that the citation at column 14, line 62-column 15, line 10 is to *Guedalia*. The cited portion of the references state as follows:

The client computer first receives the HTML page without having the data for rendering the embedded image. In a preferred embodiment of the present invention, the HTML page identifies the image portion to be embedded as a URL with a sequence of IIP commands. The IIP command sequence contains a reference to the FLASH-PIX® image file, a specification of the region of the FLASH-PIX® image to be displayed, information about the pixel dimensions of the view window, and a CVT command.

The browser encounters the IIP command sequence and sends an IIP request for image data to the server. The server parses the request, accesses the necessary FLASH-PIX® image tiles, assembles them into a rectangular image portion, and sends the new image back to the client. In turn, the client then displays the HTML page with the new image portion embedded within it.

Guedalia, column 14, line 62-column 15, line 10.

FIG. 11 is a flowchart illustrating the operation of the application program in such a case and it is to be viewed together with FIG. 1. After starting the application program, it is confirmed that the high-resolution monitor is connected to the computer for the operating system (step S1101). Then, document data which has been formed on the assumption of being seen with a standard resolution is read from the disk interface in accordance with an instruction from the user and is written in the memory (step S1102). Suppose that an HTML (Hyper Text Markup Language) document formed on the assumption of being seen with a resolution of 1,024x768 is read. The application program performs magnifying processing for all font data of this document data (step S1103). For example, a 12-point Gothic font is converted into a 24-point Gothic font.

The document data subjected to magnifying processing for all font data is first written in the memory as high resolution image data. Then, the high resolution image data is divided into two areas in the vertical and horizontal directions, i.e., into four areas, and is again stored in the memory (step S1104).

Aratani, column 7, lines 41-46.

As shown above, *Guedalia* merely describes a browser requesting image data from a server and the server sending the new image data back to the client in response. As discussed above, the new HTML page sent by the server could be an enlarged image of the first received HTML page, but it does not teach magnifying a document in a browser where generating a magnified display of the first document comprises creating the second display, wherein the second display has a magnified display space based on a magnification factor; reading pixels from video memory for the magnified portion in a normal display space for the original document; and populating pixels in the second display to form a magnified display, as recited in claim 5.

Aratani is directed to displaying a document intended for a standard resolution display on a high-resolution display while maintaining the original font and icon display size. The above cited portion of *Aratani* merely describes the process of magnifying font data in a document intended for display on a standard resolution monitor prior to sending the data to a high resolution monitor to solve the problem of fonts and icons being displayed at smaller sizes on a display having a higher resolution. It does not teach

displaying a magnified portion of the document in a second display. Nowhere in the cited reference is reading pixels from video memory for the magnified portion in a normal display space for the original document taught or suggested.

Guedalia and *Aratani*, taken alone or in combination, fail to teach or suggest magnifying a portion of a document in a browser. There is not so much as a suggestion in either reference to modify the references to include such features. Nor is there any motivation offered in either reference for the alleged combination. The Office Action alleges that the motivation for the combination is because "it would have provided the capability for efficient caching on both the client and server sides, so as to reduce network latency for the client and also boost server performance." As discussed above, *Aratani* is directed to displaying documents intended for standard resolution display on a high-resolution display without changing font and icon sizes in the original document. Neither reference magnifies a portion of a document in a browser, as discussed above. There is no teaching or suggestion in *Guedalia* and *Aratani* that a problem exists for which magnifying a portion of a document in a browser would be a solution. Thus, *Aratani* fails to make up for the deficiencies of *Guedalia* and *Angulo*.

As to dependent claim 6, the Office Action alleges that *Guedalia* teaches populating pixels in the second display comprises for each pixel of the normal display space, populating adjacent pixels based on the magnification factor (col. 14, line 62-col. 15, line 10). The cited portion of *Guedalia* is quoted above. As discussed above, *Guedalia* merely describes a browser requesting image data from a server and the server sending the new image data back to the client in response. It does not teach magnifying a document in a browser at the client wherein the step of populating pixels in the second display comprises for each pixel of the normal display space, populating adjacent pixels based on the magnification factor.

As to dependent claim 7, the Office Action alleges that *Guedalia* teaches mapping a magnified display space for the magnified portion to corresponding pixels in a normal display space for the original document (e.g., *The response image portion is magnified to fit the size of the full view window, giving the effect of a zoom-in; col. 14, lines 14-17 and col. 16, lines 39-54*). The cited portions of *Guedalia* read as follows:

The first example is the region marked by the dotted lines. It contains sub-region 1, but is itself contained within the view window. The response image portion is magnified to fit the size of the full view window, giving the effect of a zoom-in.

Guedalia column 14, lines 14-17.

The HTML page for the zoomed-in view indicates that the user clicked somewhere in the middle of the view window with the cat.fpx image. The HREF indicates a rectangular region from (0.25, 0.25) to (0.75, 0.75), which is consistent with the IIP region command RGN=0.25, 0.25, 0.5, 0.5. (The last two parameters here are the width and height.) It also indicates a width of 280 pixels. Thus the embedded image is displayed at twice the magnification level as the previous image.

The HTML page for the further zoomed-in view indicates that the user clicked somewhere in the upper right-hand corner of the view window. The HREF indicates a rectangular region from (0.5, 0.25) to (0.75, 0.5). Again, the embedded image is at twice the magnification level as the previous image.

Guedalia column 16, lines 39-54.

The above cited portions of *Guedalia* merely describe display of a response image portion in the view window. *Guedalia* is merely representing a magnified version of a previously partitioned sub-region. As discussed above, *Guedalia* does not teach magnifying a portion of a document in a browser at the client. Nowhere in the cited reference is mapping a magnified display space for the magnified portion to corresponding pixels in a normal display space for the original document taught or suggested.

As to dependent claims 16-18, they recite subject matter addressed above with respect to claims 5-7 and are allowable for similar reasons. Claims 5-7 and 16-18 are dependent on independent claims 1 and 12 and thus, these claims distinguish over *Guedalia* and *Angiulo* for at least the reasons noted above with regards to claims 1 and 12. Moreover, *Aratani* does not provide for the deficiencies of *Guedalia* and *Angiulo*, and thus, any alleged combination of *Guedalia*, *Angiulo* and *Aratani* would not be sufficient to reject independent claims 1 and 12 or claims 5-7 and 16-18 by virtue of their dependency. Therefore, absent some teaching, suggestion, or incentive in the prior art, *Guedalia*, *Angiulo* and *Aratani* cannot be properly combined to form the claimed

invention. As a result, absent any teaching, suggestion or incentive from the prior art to make the proposed combination, the presently claimed invention can be reached only through an impermissible use of hindsight with the benefit of Applicant's disclosure a model for the needed changes.

In view of the above, the prior art references of record, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claims 1 and 12 from which claims 5-7 and 16-18 depend. Therefore, the rejection of claims 5-7 and 16-18 under 35 U.S.C. § 103 has been overcome. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 7 and 17 under 35 U.S.C. § 103.

IV. Conclusion

It is respectfully urged that the subject application is patentable over *Guedalia*, *Aratani*, *Angiulo* and *Hsing* and is now in condition for allowance and it is respectfully requested the Examiner so find and issue a Notice of Allowance in due course.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: April 27, 2005

Respectfully submitted,



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